

# TSD File Inventory Index

Date: September 12, 2008

Initial: CMH/MSD

Facility Name: <u>Reisley - National, Inc.</u>			
Facility Identification Number: <u>12D 085 352 474</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status <u>A-2</u>	1	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA) <u>See B-2</u>	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports) <u>C-2</u>	1
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	
.4 Financial Insurance (Sudden, Non Sudden)	Y	.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence <u>A-4.1 - A-4.5</u>	1	.4 RFA Reports <u>D-1.4</u>	
.2 Closure/Post Closure Plans, Certificates, etc <u>See A-4.1</u>		D.2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	
		5. RFI QAPP	

Total - 5

.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater D.3.7		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
1			

Note: Transmittal Letter to Be Included with Reports.

Comments:

# RCRA INSPECTION REPORT

USEPA #: 1L 0085352424		IEPA #: 0310635022	
Facility Name: Kearney National, Inc.		Phone #: NO PHONE	
Street Address: 201 W. Oakton		County: Cook	
City: Des Plaines		State: IL	Zip: 60017
Region: Maywood	Inspection Date: 10/14/83	From: 10:30AM To: 11:30AM	
Weather:		RECEIVED WMD RECORD CENTER	

## TYPE OF FACILITY

Notified As: <u>G</u>		Regulated As: <u>G, S</u>		JUN 02 1994	
LDF? <u>    </u> HPV? <u>    </u>		90-Day F/U Required?:		YES <u>    </u> NO <u>  K  </u>	

**TYPE OF INSPECTION**

CEI: \_\_\_\_\_ Sampling: \_\_\_\_\_ Citizen Complaint: \_\_\_\_\_ Closed: \_\_\_\_\_ Other: \_\_\_\_\_

CME/O&M: CME Record Review: \_\_\_\_\_ Follow-Up to Inspection of: \_\_\_\_\_ Withdrawal: \_\_\_\_\_

## NON-REGULATED STATUS

SQG: \_\_\_\_\_ Claimed Nonhandler: \_\_\_\_\_ Other (Specify in Narrative): \_\_\_\_\_

## PART A

Notification Date: 05/01/84, from (Initial) or (subsequent) Notification.

Initial Part A Date:     /     /     Amended:     /     /    

Part A Withdrawal requested:     /     /     Approved by (US)(IL) EPA:     /     /    

**PART B PERMIT APPLICATION** *N/A*

Part B Permit Submitted: Y or N \_\_\_\_/\_\_\_\_/\_\_\_\_ Final Permit Issued: \_\_\_\_/\_\_\_\_/\_\_\_\_

**ENFORCEMENT** N/A

Has the firm been referred to - USEPA: Y or N \_\_\_\_/\_\_\_\_/\_\_\_\_  
Illinois Attorney General: Y or N \_\_\_\_/\_\_\_\_/\_\_\_\_ County State's Attorneys: Y or N \_\_\_\_/\_\_\_\_/\_\_\_\_

ORDERS ISSUED N/A

CACO: \_\_\_\_/\_\_\_\_/\_\_\_\_ CAFO: \_\_\_\_/\_\_\_\_/\_\_\_\_ Consent Decree: \_\_\_\_/\_\_\_\_/\_\_\_\_  
Federal Court Order: \_\_\_\_/\_\_\_\_/\_\_\_\_ State Court Order: \_\_\_\_/\_\_\_\_/\_\_\_\_ IPCB Order: \_\_\_\_/\_\_\_\_/\_\_\_\_

**TSD FACILITY ACTIVITY SUMMARY**[illegible]

# OPERATOR

**PERSON(S) INTERVIEWED**

***TITLE*****PHONE #****INSPECTION PARTICIPANT(S)****AGENCY/TITLE****PHONE #**

**PREPARED BY**

**AGENCY/TITLE****PHONE #**

## SUMMARY OF APPARENT VIOLATIONS

[illegible]

Kearney National, Inc.  
0310635072  
June 16, 1993

## NARRATIVE

On June 16, 1993, Matt Plass (IEPA summer intern) and I met Richard Vamos and John Puckett (DePaul And Associates, Inc. - representing Kearney - National Inc.) at the former IPM facility located at 201 W. Oakton, DesPlains, IL.

The purpose of this inspection was to determine the facility's compliance with 725, Subpart F, Groundwater Monitoring. The building is presently vacant. International Products & Manufacturing, Inc. (IPM) vacated the building in September 1991. Kearney - National Inc., the parent company of IPM and current owner, has assumed responsibility for the remediation/RCRA clean closure activities for the drum storage (S01) and the underground spill containment tank (S02).

### S02 - Hazardous Waste Underground Spill Containment Tank

During the tank excavation, VOC contamination, principally trichloroethylene (TCE), was identified in the surrounding soils and groundwater. An activated carbon treatment system for the contaminated groundwater and a soil vapor extraction system for the contaminated soil have been approved under a RCRA closure plan approval letter dated November 30, 1992. DePaul And Associates, Inc. estimated that it will take approximately seven years to remediate the site.

### S01 - Hazardous Waste Drum Storage Area

Spent solvents were stored in containers inside the building along the north wall. A RCRA closure plan approval letter is dated April 23, 1992. Closure of the container storage area has not been completed.

If the facility does not meet clean-up objectives set forth in the approved closure plan, the facility would be required to submit a Part B Post Closure Plan to close the site as a landfill. Presently the facility is not required to comply with 725, Subpart F, Groundwater Monitoring. No apparent violations were observed during the inspection.

RECEIVED  
24 JUN 1993  
IEPA/DI PC

# LEGEND

MONITORING WELLS  
NOT INCLUDED  
IN QUARTERLY  
SAMPLING PROGRAM

MONITORING WELLS  
INCLUDED IN  
QUARTERLY  
SAMPLING PROGRAM

MONITORING WELL  
CONVERTED INTO  
EXTRACTION WELL



CAD FILE: 8330MW  
REVISED: 06/20/92

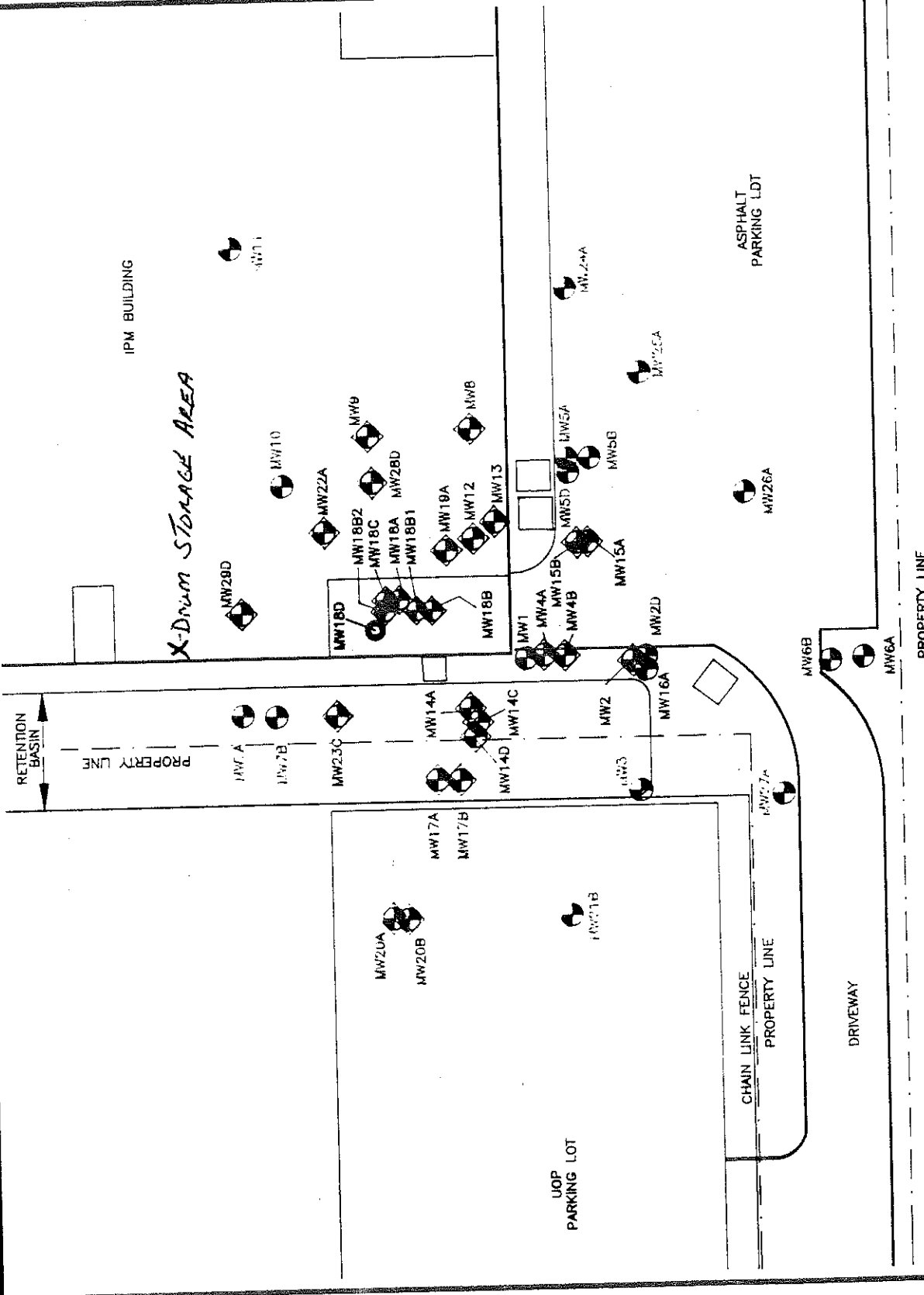
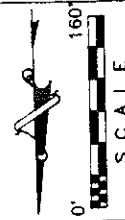


FIGURE 3  
MONITORING WELL  
LOCATIONS

KEARNEY-NATIONAL, INC.  
201 WEST OAKTON  
DES PLAINES, IL

**DEPAUL**  
AND ASSOCIATES, INC.  
ENVIRONMENTAL ENGINEERS

# LEGEND



CAD FILE: 6330-1  
REVISED: 04/04/92

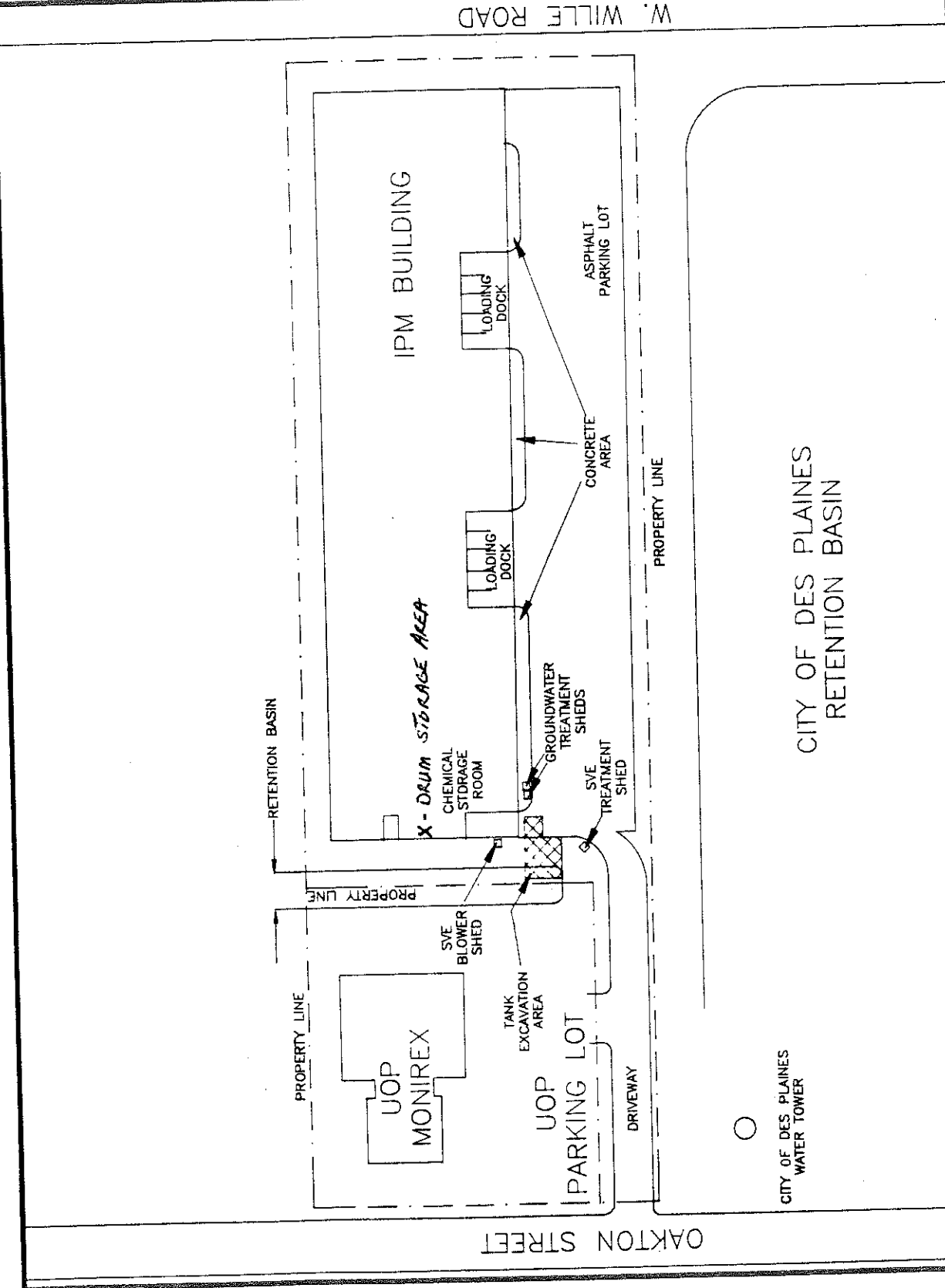


FIGURE 1  
SITE PLAN

KEARNEY-NATIONAL, INC.  
201 WEST OAKTON  
DES PLAINES, IL

**DEPAUL**  
AND ASSOCIATES, INC.





State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/782-6761

January 5, 1993

Dyson-Kissner-Moran Corporation  
Attn: John H. FitzSimons  
Secretary and General Council  
230 Park Avenue  
New York, New York 10169-0019

Re: COMPLIANCE INQUIRY LETTER  
0310635072 -- Cook County  
Kearney National, Inc.  
ILD085352474  
Compliance File

Dear Mr. FitzSimons:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 725 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on a October 14, 1992 review of documents submitted to the Agency to demonstrate compliance with the requirements of Subpart H.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Lizz Schwartzkopf  
Planning and Reporting Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

CERTIFIED MAIL PH35090771

RECEIVED

JAN 14 1993

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION IV

RECEIVED  
WIND RECTOR CENTER

OCT 27 1994



Attachment A

1. Pursuant to 35 Ill. Adm. Code 725.245, an owner or operator of a facility with a hazardous waste disposal unit shall establish financial assurance for post-closure care of the disposal unit(s). You are in apparent violation of 35 Ill. Adm. Code 725.245 for failure to establish financial assurance for post-closure care.

The facility failed to provide sufficient financial assurance for contingent post-closure care cost estimates. Contingent post-closure care cost estimates are \$1,710,000. Financial assurance for contingent post-closure care is provided in the amount of \$888,316 only.

2. Pursuant to 35 Ill. Adm. Code 725.245(e)(11), an owner or operator may meet the requirements of this Section by obtaining a written guarantee, hereafter referred to as "corporate guarantee." The guarantor shall be the parent corporation of the owner or operator. The guarantor shall meet the requirements for owners or operators in subsections (e)(1) through (e)(9), and shall comply with the terms of the corporate guarantee. The wording of the corporate guarantee must be as specified in 35 Ill. Adm. Code 724.251. The corporate guarantee must accompany the items sent to the Agency as specified in subsection (e)(3). The terms of the corporate guarantee must provide that:

- A. If the owner or operator fails to perform post-closure care of a facility covered by the corporate guarantee in accordance with the post-closure plan and other interim status requirements whenever required to do so, the guarantor will do so or establish a trust fund as specified in subsection (a) in the name of the owner or operator.
- B. The corporate guarantee will remain in force unless the guarantor sends notice of cancellation by certified mail to the owner or operator and to the Agency. Cancellation may not occur, however, during the 120 days beginning on the date of receipt of the notice of cancellation by both the owner or operator and the Agency, as evidenced by the return receipts.
- C. If the owner or operator fails to provide alternate financial assurance as specified in this Section and obtain the written approval of such alternate assurance from the Agency within 90 days after receipt by both the owner or operator and the Agency of a notice of cancellation of the corporate guarantee from the guarantor, the guarantor will provide such alternate financial assurance in the name of the owner or operator.

You are in apparent violation of 35 Ill. Adm. Code 725.245(e)(11) for the following reason(s):

1. Utilizing the \$1,710,000 post-closure cost estimate cited in point one, the facility failed to demonstrate evidence of tangible net worth in excess of six times the sum of the current closure and post-closure cost estimates as required by 35 Illinois Administrative Code 725.245(e)(1). As a result, it failed the financial test (Alternative 1) for closure and post-closure.

5HR-12

14 DEC 1989

Mr. Kerry Puzio  
ASI Environmental Technologies  
770 West Algonquin  
Arlington Heights, Illinois 60005

Re: International Products &  
Manufacturing, Inc.  
ILD 085 352 474

Dear Mr. Puzio:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on November 3, 1989. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our May 16, 1989, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

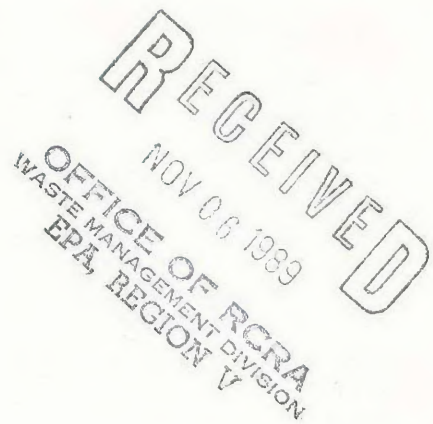
Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS  
Harry Chappel, IEPA, CMS  
bcc: Zetta Thomas

5HR-12:Z. THOMAS:or:3-7925:12/12/89:DISK#3:FILENAME:Puzio

0. r 12-13-89

RCRA ENFORCE- MENT	RYS STAFF	STB SECTION CHIEF	REB CHIEF
INIT. DATE	27 12/13/89	P.S.A. 12-13-89	



November 3, 1989

United States Environmental Protection Agency  
Region 5  
Attention: 5 HR-12  
230 South Dearborn Street  
Chicago, Illinois 60604

RE: NOV, International Products & Manufacturing, Inc. ILD 085352474

Dear Mr. Dimock:

On 30 October 1989, International Products and Manufacturing Inc. received a Notice of Violation regarding 40 CFR 268 Land Disposal Restrictions. The inspection occurred on the 16th of March, 1989 by the Illinois Environmental Protection Agency representing the United States Environmental Protection Agency (USEPA).

In the original notice of violation dated the 16th of May, 1989, The USEPA noted the violation as:

1. Failure to separate written notice attached to the manifests for each shipment of F-solvent wastes with U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7 (a) (1); and,
2. Failure to provide a complete written notice to the off-site receiving facility stating that the waste is not prohibited from land disposal, as required by 268.7 (a) (3). The notice did not contain the corresponding treatment standards and all applicable prohibitions, manifests number, and date the waste is subject to the prohibitions. In addition, a generator is required to retain copies of all notices and certifications for a period of 5 years.

The material and information questioned above is in regards to solvent contaminated soil shipped to Wayne Disposal Inc. of Belleville, Michigan, by the 28th day of October, 1988.

40 CFR Section 268.30 (a) (3) and 40 CFR Section 268.3 (b) (53 FR 31216), which outlines the waste specific prohibition on land disposal, reads as follows:

- (a) Effective November 8, 1986, the spent solvent wastes specified in 40 CFR 261.31 as EPA Hazardous Waste Nos. F001, F002, F003, F004 and F005, are prohibited under this part from land disposal (except in an injection well) unless one or more of the following conditions apply:
- (3) The initial generator's solvent waste is a solvent-water mixture, solvent-containing sludge or solid, or solvent-contaminated soil (non-CERCLA or RCRA corrective action) containing less than 1 percent total F001-F005 solvent constituents listed in Table CCWE of 268.41 of this part.
- (b) Effective November 8, 1988, the F001-F005 solvent wastes listed in paragraphs (a)(1),(2),(3), or (4) of this section are prohibited from land disposal.

Under 40 CFR 268.7 (a)(3) Notification requirements were met when a notice was forwarded to the disposal facility (See attached copy).

40 CFR 268.7 (a) (3) Reads as follows and outlines the notification requirements for generators working under and exemption or variance.

- (a) The generator must test his waste or an extract developed using the test method described i Appendix I of this part, or use knowledge of the waste to determine if the waste is restricted from land disposal under this part.
- (3) If a generator's waste is subject to a case-by-case extension under 268.5, and exemption under 268.6, an extension under 268.1 (c)(3), or a nationwide variance under Subpart C, he must forward a notice with the waste to the land disposal facility receiving his waste, stating that the waste is exempt from the land disposal restrictions.

The above listed materials fall under the National Variance according to 40 CFR 268.30 (a) (3) because the material was contaminated soil with less than one (1) percent F001-F005 constituents.

Therefore, with review of the above information, we do not feel that International Products and Manufacturing Inc. is in violation.

In response to the request from Ms. Zetta Thomas on current F waste handling practices. There is no regular F-solvent waste stream currently being generated at the Des Plaines facility nor do we anticipate any future generation of regular F-solvent waste streams. Presently, the only remaining F-solvent listed materials remaining will be disposed of by fuel blending or incineration. Disposal methods are summarized below and copies of the land ban notification forms are attached.

<u>Material</u>	<u>Disposal</u>	<u>EPA Code</u>
Soils from Hydrogeological Investigation	Incineration	F001
Wash Water From Hydrogeological Investigation	Incineration	F001
Waste Oil	Fuel Blending	F002

Should you have any questions or comments, please contact Mr. Kerry Puzio or Mr. Curtis Slocum at (708) 364-7571.

Sincerely,  
ASI Environmental Technologies



Kerry Puzio

js

CC: Mr. John Delaney, IPM  
201 West Oakton  
Des Plaines, Illinois 60017-5033



RESTRICTED WASTE SHIPMENT  
NOTIFICATION

ENSCO  
American Oil Road  
El Dorado, AR

I. Identification Information

Generator Name \_\_\_\_\_ Manifest No. \_\_\_\_\_  
Address \_\_\_\_\_ Completed by \_\_\_\_\_  
\_\_\_\_\_ Title \_\_\_\_\_  
EPA ID# \_\_\_\_\_ Date \_\_\_\_\_  
WMDS # \_\_\_\_\_

This shipment as referenced by the Manifest Number contains waste(s)  
which correspond to the following USEPA Hazardous Waste Number(s):

\_\_\_\_\_  
\_\_\_\_\_  
Additional Waste Numbers may be listed on the Manifest.

The Waste Material Data Sheet (WMDS) which contains the waste analysis  
data has previously been submitted to ENSCO. ENSCO has reviewed the  
waste analysis data and the WMDS is on file at ENSCO.

II. The treatment standard for these restricted waste is (are) listed  
below: (check appropriate blanks)

Waste code \_\_\_\_\_ Waste water \_\_\_\_\_ Non-wastewater \_\_\_\_\_

Treatment standards expressed as waste concentrations - CCW \_\_\_\_\_  
or concentrations in waste extract - CCWE \_\_\_\_\_

Treatment Standards

Concentration  
mg/l or mg/kg  
(circle one)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional waste codes are listed as attachments. Yes \_\_\_\_\_ No \_\_\_\_\_

Name \_\_\_\_\_ Signature \_\_\_\_\_ Date \_\_\_\_\_



FORM 1

NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL  
(Wastes for which treatment standards have been established or are subject to prohibition levels)

MATERIAL TYPE: ☐ SPENT SOLVENT ☐ "CALIFORNIA LIST" WASTE ☐ "FIRST THIRD" ☐ "SECOND THIRD" ☐ "THIRD THIRD"

GENERATOR'S NAME \_\_\_\_\_ MANIFEST NO. \_\_\_\_\_

GEN. EPA. ID. NUMBER \_\_\_\_\_ Line No. ☐ 11a ☐ 11b ☐ 11c ☐ 11d

EWB STREAM NO. \_\_\_\_\_ HAZARDOUS WASTE NUMBER(S) \_\_\_\_\_

I am supplying this notice and certification to Environmental Waste Resources, Inc. in accordance with the requirements of regulations at 40 CFR 268.7. I have determined that the material described above is a restricted waste as defined in 40 CFR 268. I have indicated above the type of material which is covered by this notification. I have also indicated below the appropriate management required to comply with the prohibitions on land disposal for this material.

RESTRICTED WASTE REQUIRING TREATMENT

I. ☐ I am the initial generator of an untreated waste restricted from land disposal under 40 CFR Part 268. This waste, identified above, may not be land disposed unless it is first treated to the appropriate treatment standard(s) or prohibition level(s), as indicated below.

The material described above requires treatment to the following level(s):

- ☐ (a) Treatment standards expressed as concentrations in a waste extract, as located in 40 CFR 268.41 for \_\_\_\_\_
- ☐ (b) Treatment standards expressed as specific technologies, as located in 40 CFR 268.42 for \_\_\_\_\_
- ☐ (c) Treatment standards expressed as concentrations in the waste, as located in 40 CFR 268.43, for \_\_\_\_\_
- ☐ (d) Waste specific prohibition level(s), as located in 40 CFR 268.32. The specific prohibition(s) is/are for \_\_\_\_\_

RESTRICTED WASTE NOT REQUIRING FURTHER TREATMENT

II. ☐ The above waste, as generated, meets the treatment standards under 40 CFR Part 268, Subpart D.

The material described above, as generated, meets the following treatment standard(s):

- ☐ (a) Treatment standards expressed as concentrations in a waste extract, as located in 40 CFR 268.41 for \_\_\_\_\_
- ☐ (b) Treatment standards expressed as specific technologies, as located in 40 CFR 268.42 for \_\_\_\_\_

I have attached waste analysis data upon which I have made this determination.

"I Certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."

SIGNATURE \_\_\_\_\_ NAME (Print) \_\_\_\_\_ DATE \_\_\_\_\_

RESTRICTED WASTE SUBJECT TO EXTENSION, PETITION, OR VARIANCE

III. ☐ The waste identified above is subject to:

- ☐ (a) A nation wide capacity variance under 40 CFR Part 268, Sub-part C.
- ☐ (b) A case-by-case extension under 40 CFR 268.5
- ☐ (c) A no-migration petition under 40 CFR 268.6.

The variance, extension, or petition applicable to the material described above expires on the following date: \_\_\_\_\_

I hereby certify that all information supplied above, and attached, is complete and accurate to the best of my knowledge and ability to determine that no omissions or errors exist.

NAME \_\_\_\_\_ TITLE \_\_\_\_\_

SIGNATURE \_\_\_\_\_ DATE \_\_\_\_\_

EPA 601

## PURGEABLE HALOCARBONS

CLIENT:	IFM	DATE SAMPLED:	09/13/88
PROJECT:	Tank Removal - Disposal	DATE RECEIVED:	09/14/88
ASI REF. NO.:	81789	DATE FINISHED:	09/16/88
SAMPLED BY:	ASI - JP	REPORT DATE:	09/16/88
DESCRIPTION:	Soil Sample		
ANALYST:	LBC		

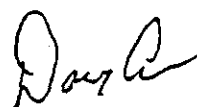
ASI SAMPLE I.D.: 6414  
CLIENT SAMPLE I.D.: Composite Sample of  
(Bottom Center, East Wall  
West Wall, North Wall Excavations)

=====

BROMODICHLOROMETHANE	ND
BROMOFORM	ND
CARBON TETRACHLORIDE	ND
CHLOROBENZENE	ND
CHLOROFORM	ND
DIBROMOCHLOROMETHANE	ND
1,1-DICHLOROETHANE	ND
1,2-DICHLOROETHANE	ND
1,1-DICHLOROETHENE	ND
1,2-DICHLOROETHENE	
(cis & trans)	19,500
1,2-DICHLOROPROPANE	ND
1,3-DICHLOROPROPENE	
(cis & trans)	ND
METHYLENE CHLORIDE	ND
1,1,2,2-TETRACHLOROETHANE	ND
TETRACHLOROETHENE	920
1,1,1-TRICHLOROETHANE	ND
1,1,2-TRICHLOROETHANE	ND
TRICHLOROETHENE	43,300

ND = Non Detectable      Detection Limit 16 ug/kg

All results are in ug/kg

  
Doug Conran  
Lab Director

EPA 602

## VOLATILE AROMATIC HYDROCARBON SCAN

CLIENT:	IPM	DATE SAMPLED:	09/13/88
PROJECT:	Tank Removal - Disposal	DATE RECEIVED:	09/14/88
ASI REF. NO.:	81789	DATE FINISHED:	09/16/88
SAMPLED BY:	ASI - JP	REPORT DATE:	09/16/88
DESCRIPTION:	Soil Sample		
ANALYST:	LBC		

ASI SAMPLE I.D.: 6414  
CLIENT SAMPLE I.D.: Composite of  
(Bottom Center, East Wall, West  
Wall, North Wall Excavations)


=====

BENZENE .....	ND
TOLUENE .....	ND
ETHYLBENZENE .....	24
CHLOROBENZENE .....	ND
m-DICHLOROBENZENE .....	ND
p-DICHLOROBENZENE .....	ND
o-DICHLOROBENZENE .....	ND

ND = Non Detectable

Detection Limit 16 ug/kg

All results are in ug/kg

  
Doug Conran  
Lab Director



INTERNATIONAL PRODUCTS & MANUFACTURING CO.

201 W. OAKTON ST. • P.O. BOX 5033 • DES-PLAINES, IL 60017 • (312) 635-8080

September 21, 1988

Wayne Disposal

Attn: Mr. Gazi George

Ref: WDI Approval #4295GLE

This is notice pursuant to 40 CFR 268.7(a) (3) that hazardous waste being shipped to Wayne Disposal Inc. (Michigan Disposal Inc.) under approval number 4295 GLE and identified as hazardous waste number F001 is subject to a nationwide variance from land disposal bans under provision of 40 CFR 268.30(a).

IPM's contractor: ASI  
Environmental Technologies  
POC Mr. Curtis Slocum

Sincerely,

*Stephen Welsch*  
Stephen Welsch  
Controller

SW/dtg

26 OCT 1989

5HR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Elmer Trapp  
International Products &  
Manufacturing, Inc.  
201 West Oakton  
DesPlaines, Illinois 60017

Re: Notice of Violation  
International Products &  
Manufacturing, Inc.  
ILD 085 352 474

Dear Mr. Trapp:

On May 16, 1989, the United States Environmental Protection Agency submitted to you a Notice of Violation (NOV) in regards to the above-referenced facility. The NOV was a result of a March 16, 1989, 40 CFR Part 268 land disposal restrictions inspection conducted by the Illinois Environmental Protection Agency, representing the United States Environmental Protection Agency. Our office has not received from you the appropriate documentation demonstrating that the violations identified in the NOV have been corrected. A copy of the May 16, 1989, Notice of Violation and the land disposal restrictions handbook are enclosed for your information.

Please submit to this office within ten (10) days of receipt of this notice, information indicating that the violations have been corrected and what measures have been initiated to assure future compliance with 40 CFR Part 268 land disposal restrictions. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosures

cc: Harry Chappel, IEPA-CMS  
Glenn Savage, IEPA-FOS

bcc: Zetta L. Thomas, REB  
5HR-12:Z.THOMAS:or:3-7925:10/06/89:DISK PC#2:FILENAME:trapp

0-9/06/89

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	ZT 10/24	P.E.M. 10-25	

16 MAY 1989

5HR-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Elmer Trapp  
International Products & Mfg. Inc.  
201 West Oakton  
DesPlaines, Illinois 60017

Re: Notice of Violation  
International Products & Mfg. Inc.  
ILD 085 352 474

Dear Mr. Trapp:

On March 16, 1989, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 waste solvents became effective on November 8, 1986, (reference 51 Federal Register 40636: revisions to 40 CFR Parts 260-265, 268, and 270-271) and for California List hazardous wastes on July 8, 1987, (reference 52 Federal Register 25760: revisions to 40 CFR Parts 262, 264, 265, 268, and 270-271). Additionally, the land disposal restrictions for the First Third of Scheduled Wastes became effective on August 8, 1988, (53 Federal Register 31138: revisions to 40 CFR Parts 264, 265, 266, 268, and 271).

With respect to the land disposal restrictions (40 CFR Part 268) section of the inspection, your facility was found to be in violation of the following:

1. Failure to provide a separate written notice attached to the manifest for each shipment of F-solvent wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest number, and waste analysis data, where available, as required by Section 268.7(a)(1); and.



2. Failure to provide a complete written notice to the off-site receiving facility stating that the waste is not prohibited from land disposal, as required by 268.7(a)(3). The notice did not contain, the corresponding treatment standards and all applicable prohibitions, manifest number, and date the waste is subject to the prohibitions. In addition, a generator is required to retain copies of all notices and certifications for a period of 5 years.

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above-cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS  
Glen Savage, IEPA-FOS  
Donna Czech, IEPA

5HR-12:ZTHOMAS:ev:3-7928:05/03/89:DISK#3:NAME FILE:ELMER TRAPP

5-10-89  
E.V.

RCRA ENFORCE- MENT	REB STAFF	REB SECTION CHIEF	REB CHIEF
INIT. DATE	<i>5/12/89</i>	<i>PEJ</i> <i>5-12-89</i>	

[illegible]

Telephone #: (312) 635-8080

Address: 201 WEST OAKTON

ZLS Code: 60017

Owner: JOHN HANCOCK PROPERTIES, INC.

Telephone #: (617) 572-3820

STREET: TWO COPLEY PLACE, SUITE 200, P.O. BOX 111

City: BOSTON.

State: MASS. Zip Code: 02117

32-110

Telephone 6

DIRECTOR OF OPERATIONS (312) 635-5050

SENIOR STAFF GEOLOGIST  
ENSR CONSULTING + ENGINEERING (312) 857-1700

ENVIRONMENTAL CONSULTANT  
ASI ENVIRON. TECHNOLOGIES (312) 304-7571

ENSR CONSULTING + EN

ENSR CONSULTING + ENGINEERING (312) 857-1700

ENVIRONMENTAL CONSULTANT

ENVIRONMENTAL CONSULTANT

ASI ENVIRON. TECHNOLOGIES (312) 364-7571

Agency / Title

Telephons 8

1EPA / E.P.S.

(312) 345-9780

Agency/Title

Telefona :

1EPA / E.P.S.

(312) 345-9780

### Summary of Apparent Violations

Area	Class	Section
OTH	1	722.111
OTH	1	722.134(a)
		(722.134(a))
		(725.274)
OTH	2	722.134(d)(5)
TH	2	722.140(c)
CLO	1	725.212(a)
FIN	1	725.242(a)
OTH	1	809.301

[illegible][illegible]

## WASTE DISPOSITION FORM

Facility name: INTERNATIONAL PRODUCTS & MFG. INC.USEPA #: 14D085352474IEPA #: 03/0635072

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt. for 88 * 87 * 86 *	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
WASTE TRICHLOROETHYLENE	DEGREASING PARTS IN ASSEMBLY PROCESS	ANALYZED AT RECEIVING FACILITY	F001	YES	N/A	No No YES	approx. 40 gal.	very small quantities generated	7/23/86	BARDN BLAKESLEE in CICERO, ILLINOIS for SOLVENT RECOVERY
WASTE OIL	USED HYDRAULIC OIL FROM PUNCH PRESS OPERATION	ANALYSIS NOT AVAILABLE	ANALYSIS NOT AVAILABLE	No	N/A	No No No	3 DRUMS	very small quantities generated	Not SHIPPED BY MANIFEST	DISPOSITION OF PAST SHIPMENTS UNKNOWN

\* All "No" responses must be explained in the narrative.

## NARRATIVE

International Products and Manufacturing, Inc. (IPM) manufactures electrical parts and components such as alternators, starters and other electrical equipment. Operations at this site include assembly work and punch press operations. IPM also sells component parts. There is a warehouse on-site for the storage of finished products prior to shipping.

### Hazardous Wastes

#### Waste trichloroethylene (F001)

- from degreasing parts in the assembly process
- rate of generation is less than 100 kg per month
- shipped to Baron Blakeslee in Cicero, Illinois for solvent recovery
- a shipment is made when economically feasible
- approximately 40 gallons currently on site

### Non-Hazardous Wastes

#### Waste oil

- used hydraulic oil from the punch press operation
- rate of generation is less than 1 drum per year
- the disposition of past shipments is not known by the current plant operators
- frequency of past shipments is unknown
- 3 drums currently on site

### Hazardous Waste Units

#### S02 - Underground Tank

- capacity of approximately 470 gallons
- installed on northwest side of the property in 1981
- intended for use as a "spill" or emergency use tank
- release of hazardous material from this tank discovered in August 1988
- tank and a large quantity of contaminated soil (F001) removed in October 1988

A voluntary clean-up was begun in the fall of 1988 following the discovery of the release from the tank. Because hazardous waste, specifically trichloroethylene, was apparently stored in the tank for over 180 days, the area where the tank was located will have to go through RCRA closure.

### Notes

IPM has been operating at this site for nine years. The storage tank was installed by IPM in 1981. No one currently employed at IPM has any knowledge as to the type of material that was placed in the tank or when this occurred. The hazardous nature of the material was determined when a release from the tank was discovered on August 19, 1988. IPM is planning to move its manufacturing operations to another site by late spring, leaving only the warehouse at this address.

IPM appears to be operating as a small quantity generator. Trichloroethylene is used in a vapor degreaser for parts cleaning in the assembly process. Because most of the solvent is allowed to evaporate, very little spent solvent is generated. The spent trichloroethylene currently on-site was drained from the degreaser because of a problem with the heating element. The last shipment of spent trichloroethylene was on July 23, 1986. A company representative stated that the last purchase of trichloroethylene (800 gallons) was on March 11, 1988. At the time of the inspection, approximately 500 gallons of clean trichloroethylene remained unused.

At the time of the inspection, there were 19 drums on site which contain hazardous waste of various EPA code numbers. Company representatives stated that these drums were the result of a one-time house cleaning around the plant. Because these drums contain approximately 3,000 kg of hazardous waste, IPM is currently regulated as a generator subject to reduced requirements.

#### Apparent Violations

- 722.111           No hazardous waste determination made for the waste oil
- 722.134(d)       (722.134(a)) Nineteen drums not marked "Hazardous Waste" or  
marked with accumulation dates  
  
                  (725.274) Weekly inspections not being conducted of container  
accumulation area
- 722.134(d)(5)   Emergency information not posted next to a telephone
- 722.140(c)       No waste analysis available for the waste oil
- 725.212(a)       No closure plan available for the underground storage tank
- 725.242(a)       No closure cost estimate available for the underground storage  
tank
- 809.301           Shipping waste oil, which is a special waste, without manifests
- 215.183           of the Air Pollution Regulations: Operation of an open top  
vapor degreaser with the lid continuously open, allowing solvent  
to evaporate into the atmosphere

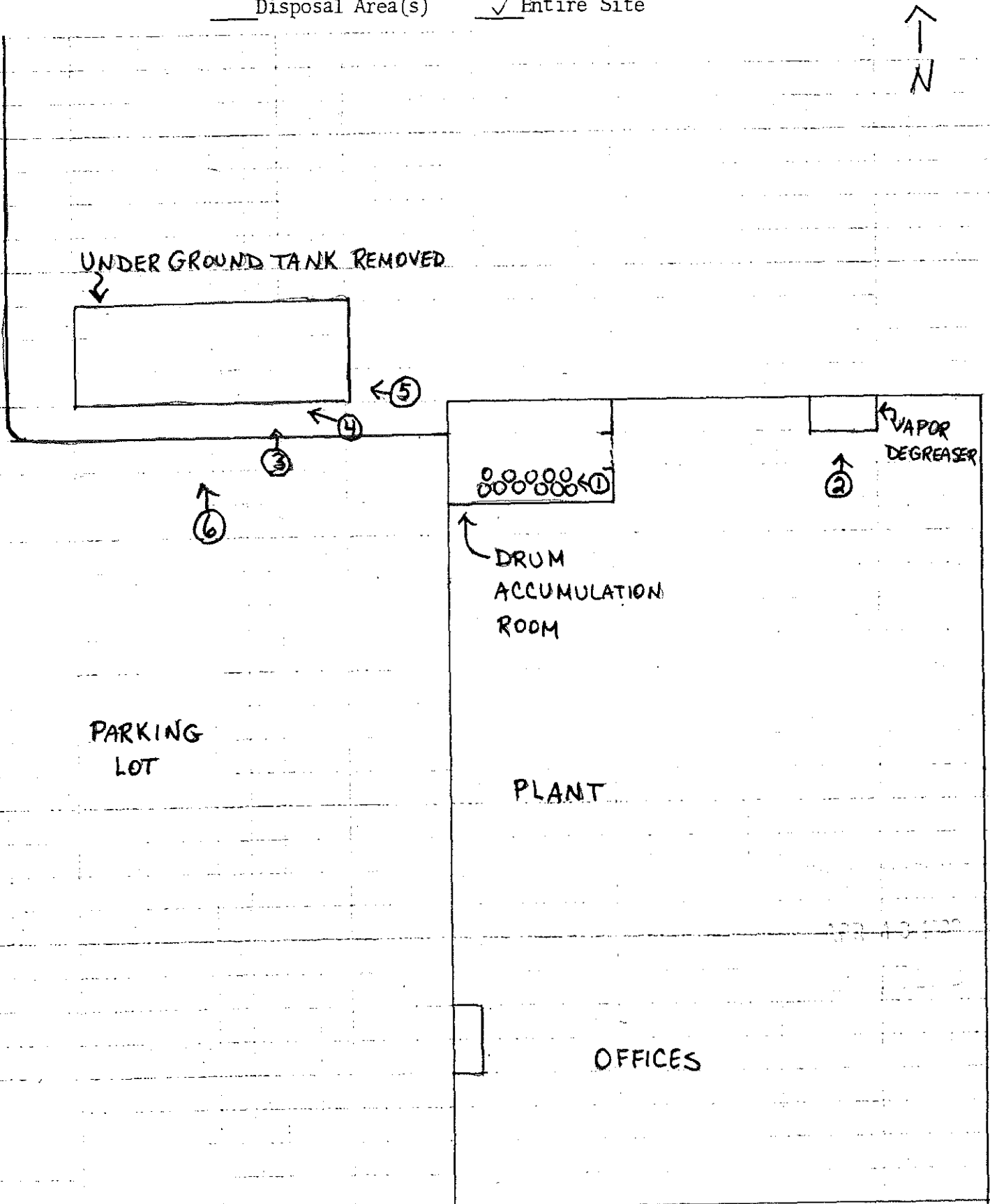


Facility Name: INTERNATIONAL PRODUCTS & MFG. INC.

USEPA Number: 1LD085352474

IEPA Number: 6310635072

Sketch of Site: Accumulation Area(s) Treatment Area(s) Storage Area(s)  
Disposal Area(s) ☒ Entire Site



NOT TO SCALE

OUT  
2-27-89

FOS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: INTERNATIONAL PRODUCTS & MFG. INC.  
U.S. EPA I.D. No.: ILD 085352474 0310635072  
Street: 201 WEST OAKTON  
City: DES PLAINES State: ILLINOIS Zip Code: 60017  
Telephone: (312) 635-8080  
Operator: INTERNATIONAL PRODUCTS & MFG. INC.  
Street: 201 WEST OAKTON  
City: DES PLAINES State: ILLINOIS Zip Code: 60017  
Telephone: (312) 635-8080  
Owner: JOHN HANCOCK PROPERTIES, INC.  
Street: TWO COPLEY PLACE, SUITE 200; P.O. BOX 111  
City: BOSTON State: MASSACHUSETTS Zip Code: 02117  
Telephone: (617) 572-3829  
Inspection Date: 03/16/89 Time: 10:15<sup>am</sup> - 1:15<sup>pm</sup> Weather Conditions: 45°

	Name	Affiliation	Telephone
Inspectors:	<u>DONNA CZECH</u>	<u>IEPA</u>	<u>(312) 345-9780</u>


Facility Representatives: ELMER TRAPP (312) 635-8080  
CURTIS SLDCOM - ENV. CONSULTANT (312) 364-7571  
SCOTT DAVIES - GEOLOGIST (312) 887-1700

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u>✓</u>	<u>✓</u>	<u>RECEIVED</u>	<u>APR 13 1989</u>
Transporter	<u> </u>	<u> </u>	<u>IEPA-DLPC</u>	<u> </u>
Treater	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Storer	<u>✓</u>	<u>✓</u>	<u> </u>	<u> </u>
Disposer	<u> </u>	<u> </u>	<u> </u>	<u> </u>

## INSPECTION SUMMARY

FOR FACILITY BACKGROUND, SEE RCRA NARRATIVE

### APPARENT LAND DISPOSAL RESTRICTION VIOLATIONS:

- 1) NO NOTIFICATION TO OFF-SITE TSD'S FOR SHIPMENTS OF F-SOLVENT WASTES: F001 F003
- 2) NOTIFICATION TO DISPOSAL FACILITY FOR SHIPMENTS OF CONTAMINATED SOIL  
DOES NOT INCLUDE: TREATMENT STANDARDS  
MANIFEST NUMBER  
DATE THAT WASTE IS SUBJECT TO PROHIBITIONS
- 3)  COPIES OF NOTIFICATIONS NOT AVAILABLE AT TIME OF INSPECTION.

## NARRATIVE

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- 809.301           Shipping waste oil, which is a special waste, without manifests
- 215.183           of the Air Pollution Regulations: Operation of an open top  
                  vapor degreaser with the lid continuously open, allowing solvent  
                  to evaporate into the atmosphere

**RCRA LAND DISPOSAL RESTRICTION INSPECTION  
APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
<b>A. <u>F-Solvent Wastes</u></b>						
1.	F001	<u>✓</u>	<u>      </u>	<u>✓</u>	<u>      </u>	<u>      </u>
2.	F002	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
3.	F003	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
4.	F004	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
5.	F005	<u>✓</u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

**B. California List Wastes *NONE GENERATED***

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Cadmium	100 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Chromium VI	500 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Lead	500 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Mercury	20 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Nickel	134 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Selenium	100 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
Thallium	130 mg/L	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>



2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm \_\_\_\_\_

500 ppm \_\_\_\_\_

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, state reasons for mixing:

\_\_\_\_\_

\_\_\_\_\_

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

\_\_\_\_\_

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes *NONE GENERATED*

- Note: (1) The detailed description for waste codes are listed in Appendix C.  
 (2) EPA has promulgated the treatment standards for the following waste code with \*.

	Gen.	Treat	Store	Disp.	Trans.
F006*	_____	_____	_____	_____	_____
F007	_____	_____	_____	_____	_____
F008	_____	_____	_____	_____	_____
F009	_____	_____	_____	_____	_____
F019	_____	_____	_____	_____	_____
K001*	_____	_____	_____	_____	_____
K004*	_____	_____	_____	_____	_____
K008*	_____	_____	_____	_____	_____
K011	_____	_____	_____	_____	_____
K013	_____	_____	_____	_____	_____
K014	_____	_____	_____	_____	_____
K015*	_____	_____	_____	_____	_____
K016*	_____	_____	_____	_____	_____
K017	_____	_____	_____	_____	_____
K018*	_____	_____	_____	_____	_____
K019*	_____	_____	_____	_____	_____
K020*	_____	_____	_____	_____	_____
K021*	_____	_____	_____	_____	_____
K022*	_____	_____	_____	_____	_____
K024*	_____	_____	_____	_____	_____
K025*	_____	_____	_____	_____	_____
K030*	_____	_____	_____	_____	_____
K031	_____	_____	_____	_____	_____
K035	_____	_____	_____	_____	_____
K036*	_____	_____	_____	_____	_____
K037*	_____	_____	_____	_____	_____
K044*	_____	_____	_____	_____	_____
K045*	_____	_____	_____	_____	_____
K046*	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
K047*	_____	_____	_____	_____	_____
K048*	_____	_____	_____	_____	_____
K049*	_____	_____	_____	_____	_____
K050*	_____	_____	_____	_____	_____
K051*	_____	_____	_____	_____	_____
K052*	_____	_____	_____	_____	_____
K060*	_____	_____	_____	_____	_____
K061*	_____	_____	_____	_____	_____
K062*	_____	_____	_____	_____	_____
K069*	_____	_____	_____	_____	_____
K071*	_____	_____	_____	_____	_____
K073*	_____	_____	_____	_____	_____
K083*	_____	_____	_____	_____	_____
K084	_____	_____	_____	_____	_____
K085	_____	_____	_____	_____	_____
K086*	_____	_____	_____	_____	_____
K087*	_____	_____	_____	_____	_____
K099*	_____	_____	_____	_____	_____
K100*	_____	_____	_____	_____	_____
K101*	_____	_____	_____	_____	_____
K102*	_____	_____	_____	_____	_____
K103*	_____	_____	_____	_____	_____
K104*	_____	_____	_____	_____	_____
K106*	_____	_____	_____	_____	_____
P001	_____	_____	_____	_____	_____
P004	_____	_____	_____	_____	_____
P005	_____	_____	_____	_____	_____
P010	_____	_____	_____	_____	_____
P011	_____	_____	_____	_____	_____
P012	_____	_____	_____	_____	_____
P015	_____	_____	_____	_____	_____
P016	_____	_____	_____	_____	_____
P018	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
P020	_____	_____	_____	_____	_____
P030	_____	_____	_____	_____	_____
P036	_____	_____	_____	_____	_____
P037	_____	_____	_____	_____	_____
P039	_____	_____	_____	_____	_____
P041	_____	_____	_____	_____	_____
P048	_____	_____	_____	_____	_____
P050	_____	_____	_____	_____	_____
P058	_____	_____	_____	_____	_____
P059	_____	_____	_____	_____	_____
P063	_____	_____	_____	_____	_____
P068	_____	_____	_____	_____	_____
P069	_____	_____	_____	_____	_____
P070	_____	_____	_____	_____	_____
P071	_____	_____	_____	_____	_____
P081	_____	_____	_____	_____	_____
P082	_____	_____	_____	_____	_____
P084	_____	_____	_____	_____	_____
P087	_____	_____	_____	_____	_____
P089	_____	_____	_____	_____	_____
P092	_____	_____	_____	_____	_____
P094	_____	_____	_____	_____	_____
P097	_____	_____	_____	_____	_____
P102	_____	_____	_____	_____	_____
P105	_____	_____	_____	_____	_____
P108	_____	_____	_____	_____	_____
P110	_____	_____	_____	_____	_____
P115	_____	_____	_____	_____	_____
P120	_____	_____	_____	_____	_____
P122	_____	_____	_____	_____	_____
P123	_____	_____	_____	_____	_____
U007	_____	_____	_____	_____	_____
U009	_____	_____	_____	_____	_____

	APP				
	Gen.	Treat	Store	Disp.	Trans.
U010	_____	_____	_____	_____	_____
U012	_____	_____	_____	_____	_____
U016	_____	_____	_____	_____	_____
U018	_____	_____	_____	_____	_____
U019	_____	_____	_____	_____	_____
U022	_____	_____	_____	_____	_____
U029	_____	_____	_____	_____	_____
U031	_____	_____	_____	_____	_____
U036	_____	_____	_____	_____	_____
U037	_____	_____	_____	_____	_____
U041	_____	_____	_____	_____	_____
U043	_____	_____	_____	_____	_____
U044	_____	_____	_____	_____	_____
U046	_____	_____	_____	_____	_____
U050	_____	_____	_____	_____	_____
U051	_____	_____	_____	_____	_____
U053	_____	_____	_____	_____	_____
U061	_____	_____	_____	_____	_____
U063	_____	_____	_____	_____	_____
U064	_____	_____	_____	_____	_____
U066	_____	_____	_____	_____	_____
U067	_____	_____	_____	_____	_____
U074	_____	_____	_____	_____	_____
U077	_____	_____	_____	_____	_____
U078	_____	_____	_____	_____	_____
U086	_____	_____	_____	_____	_____
U089	_____	_____	_____	_____	_____
U103	_____	_____	_____	_____	_____
U105	_____	_____	_____	_____	_____
U108	_____	_____	_____	_____	_____
U115	_____	_____	_____	_____	_____
U122	_____	_____	_____	_____	_____
U124	_____	_____	_____	_____	_____

APP

	Gen.	Treat	Store	Disp.	Trans.
U129	_____	_____	_____	_____	_____
U130	_____	_____	_____	_____	_____
U133	_____	_____	_____	_____	_____
U134	_____	_____	_____	_____	_____
U137	_____	_____	_____	_____	_____
U151	_____	_____	_____	_____	_____
U154	_____	_____	_____	_____	_____
U155	_____	_____	_____	_____	_____
U157	_____	_____	_____	_____	_____
U158	_____	_____	_____	_____	_____
U159	_____	_____	_____	_____	_____
U171	_____	_____	_____	_____	_____
U177	_____	_____	_____	_____	_____
U180	_____	_____	_____	_____	_____
U185	_____	_____	_____	_____	_____
U188	_____	_____	_____	_____	_____
U192	_____	_____	_____	_____	_____
U200	_____	_____	_____	_____	_____
U209	_____	_____	_____	_____	_____
U210	_____	_____	_____	_____	_____
U211	_____	_____	_____	_____	_____
U219	_____	_____	_____	_____	_____
U220	_____	_____	_____	_____	_____
U221	_____	_____	_____	_____	_____
U223	_____	_____	_____	_____	_____
U226	_____	_____	_____	_____	_____
U227	_____	_____	_____	_____	_____
U228	_____	_____	_____	_____	_____
U237	_____	_____	_____	_____	_____
U238	_____	_____	_____	_____	_____
U248	_____	_____	_____	_____	_____
U249	_____	_____	_____	_____	_____



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)  
☐ Pharmaceutical wastewater containing spent methylene chloride  
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

*NONE GENERATED*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes      ☐ No      ☐ NA

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes      ☐ No      ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. First Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste? NONE GENERATED

☐ Yes      ☐ No      ☐ NA

If yes, check the appropriate treatability group.

☐ Wastewater (less than 1% TOC by weight and less than 1% filterable solids)  
☐ Nonwastewaters

List the waste code and check the correct treatment standard group.

Waste Code	Wastewater	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

#### B. Waste Analysis

##### 1. F-Solvent Wastes

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes      ☐ No      ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes      ☐ No

If yes, is any supporting data available for review? Describe how this is adequate. TRICHLOROETHYLENE USED FOR DEGREASING, RESULTING IN SPENT TRICHLOROETHYLENE

- TCLP

☐ Yes      ☒ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
 \_\_\_\_\_

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes      ☐ No      ☐ NA

If yes, specify the waste stream: F001, F003, F005

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes      ☒ No      ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

WASTE STREAM DOES NOT CHANGE FOR F001  
F003 & F005 ARE FROM ONE-TIME GENERATION OF SPENT  
LACQUERS, THINNERS, ETC.

## 2. California List Wastes

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes      ☐ No      ☐ NA

- b. If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?

☐ Yes      ☐ No      ☐ NA

What type of absorbent is used? \_\_\_\_\_  
 Check the types of waste to which absorbent is added.

☐ Liquid hazardous waste having a pH less than or equal to 2

☐ Liquid hazardous waste containing metals

☐ Liquid hazardous waste containing free cyanides

- c. Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:

- Knowledge of wastes

☐ Yes      ☐ No      ☐ NA

If yes, is any supporting data available for review? Describe how this is adequate. \_\_\_\_\_

- Testing \_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

If yes, list test method used: \_\_\_\_\_

d. Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

- If yes, list test method used and constituent and concentration levels that exceeded prohibition levels: \_\_\_\_\_

e. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

3. First Third Wastes:

a. Does the generator correctly determine the appropriate treatment standard of the waste?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ NA

Note: The treatment standards for first third wastes are given in Appendix D.

b. Does the generator determine whether the First Third waste exceeds treatment standards upon generation?

\_\_\_\_\_ Yes \_\_\_\_\_ No \_\_\_\_\_ Soft hammer

If yes, specify the waste stream: \_\_\_\_\_

How was this determination made?

- Knowledge of waste

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, is any supporting data available for review? Describe how this is adequate. \_\_\_\_\_

- TCLP

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

- Total Constituent Analysis

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

Provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_

- c. Does the generator dilute the waste as a substitute for adequate treatment [268.3]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

- d. How does the generator test the waste when a process or waste stream changes?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. Management

1. On-Site Management

Is restricted waste or waste that exceeds the treatment standards treated, stored, or disposed on-site?

☒ Yes      \_\_\_\_\_ No

FOOI FORMERLY STORED IN  
UST ON-SITE

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes      \_\_\_\_\_ No

- b. Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

\_\_\_\_\_ Yes      ☒ No

## c. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No  
 Applicable treatment standards ☐ Yes ☐ No  
 Manifest number ☐ Yes ☐ No  
 Waste analysis data, if available ☐ Yes ☐ No

Identify off-site treatment or storage facilities: BARON BLAKESLEE  
in CICERO, ILLINOIS; ENVIRONMENTAL WASTE CONTROL in INKSTER,  
MICHIGAN

## d. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

☒ Yes ☐ No

CONTAMINATED SOIL FROM  
REMOVAL OF UST

## e. Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

☐ Yes ☐ No

SEE (g) BELOW

## f. Does notification contain the following?

EPA Hazardous waste number(s) ☐ Yes ☐ No  
 Applicable treatment standards ☐ Yes ☐ No  
 Manifest number ☐ Yes ☐ No  
 Waste analysis data, if available ☐ Yes ☐ No  
 Certification that the waste meets treatment standards ☐ Yes ☐ No

Identify off-site land disposal facilities: WAYNE DISPOSAL #2 in  
BELLEVEILLE, MICHIGAN & MICHIGAN DISPOSAL INC.

## g. Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?

☒ Yes ☐ No ☐ NA

## h. If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

☒ Yes ☐ No



- i. If yes, does the notification contain the following information?

EPA Hazardous waste number	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
The corresponding treatment standards and all applicable prohibitions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Manifest number	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste analysis data, if available	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Date the waste is subject to the prohibitions	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

- j. Does the generator retain copies of all notices and certifications for a period of 5 years?

☐ Yes ☒ No

**D. Demonstration and Certification -- "Soft Hammer" Wastes NONE GENERATED**

- a. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?
- ☐ Yes ☐ No
- b. Has the generator submitted to the Regional Administration a demonstration and certification containing the following information to document its efforts to locate practically available treatment:

A list of facilities and facility officials contacted?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Addresses	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Telephone Numbers	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Contact dates	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Attach a copy of the demonstration and certification

- c. If the generator has determined that there is no practically available treatment for its wastes, has it sent documentation to EPA demonstrating why it was not able to obtain treatment or recovery for the waste?
- ☐ Yes ☐ No

If yes, attach a copy of written discussion.

- d. Does the generator ship his waste off-site for treatment?

\_\_\_\_ Yes      \_\_\_\_ No

Describe the type of treatment and treatment facilities \_\_\_\_\_

\_\_\_\_\_

- e. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

\_\_\_\_ Yes      \_\_\_\_ No

- f. Does the generator provide certification with each subsequent shipment of wastes?

\_\_\_\_ Yes      \_\_\_\_ No

- g. Does the generator provide the following notification to the receiving facility with each shipment of waste?

(i) EPA Hazardous waste number \_\_\_\_ Yes      \_\_\_\_ No

(ii) Manifest number \_\_\_\_ Yes      \_\_\_\_ No

(iii) Waste analysis data,  
if available \_\_\_\_ Yes      \_\_\_\_ No

- h. Does the generator retain copies of all notices, demonstrations, and certifications for a period of 5 years?

\_\_\_\_ Yes      \_\_\_\_ No

**E. Treatment Using RCRA 264/265 Exempt Units or Processes**

(i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

\_\_\_\_ Yes      ✓ No

If yes, list types of waste treatment units and processes:

\_\_\_\_\_

\_\_\_\_\_

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

WASTE FORMERLY STORED IN  
UST WHICH HAS BEEN  
REMOVED. SEE NARRATIVE.

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent      ☐ Yes      ☐ No      ☐ NA  
o California List      ☐ Yes      ☐ No      ☐ NA  
o First Third      ☐ Yes      ☐ No      ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes      ☐ No

- a. What date was the waste analysis plan last revised? \_\_\_\_\_

- b. Are analyses conducted on-site or off-site?

☐ On-site      ☐ Off-site

Identify off-site lab: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- c. Is F-solvent waste analyzed using TCLP?

☐ Yes      ☐ No      ☐ NA

- d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

☐ Yes      ☐ No      ☐ NA

Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

- e. Describe the frequency of sampling: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

\_\_\_\_ Yes      \_\_\_\_ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

\_\_\_\_ Yes      ☒ No

POOL WAS FORMERLY STORED  
IN UST WHICH HAS BEEN  
REMOVED. SEE NARRATIVE.

If no, go to C, Treatment.

2. If yes, check the appropriate method.

\_\_\_\_ Tanks  
\_\_\_\_ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

\_\_\_\_ Yes      \_\_\_\_ No

5. Do operating records agree with container labeling?

\_\_\_\_ Yes      \_\_\_\_ No      \_\_\_\_ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

\_\_\_\_ Yes      \_\_\_\_ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, state how: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

C. Treatment *NO TREATMENT*

1. Does the facility treat restricted wastes other than in surface impoundments?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

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3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Is dilution used as a substitute for treatment?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: \_\_\_\_\_

---



---



8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

**D. Treatment In Surface Impoundments**

1. Are restricted wastes placed in surface impoundments for treatment?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Provide the frequency of analyses conducted on treatment residues: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

\_\_\_\_\_ Yes \_\_\_\_\_ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge \_\_\_\_\_ Yes \_\_\_\_\_ No

Supernatant \_\_\_\_\_ Yes \_\_\_\_\_ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

\_\_\_\_\_ Yes \_\_\_\_\_ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

\_\_\_\_\_ Yes \_\_\_\_\_ No

c. Are residues subsequently managed in another surface impoundment?

\_\_\_\_\_ Yes \_\_\_\_\_ No

d. Are residues treated prior to disposal?

\_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, are waste residues treated on-site or off-site?

\_\_\_\_\_ On-site \_\_\_\_\_ Off-site

Identify treatment method: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**E. Land Disposal**

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: \_\_\_\_\_  
\_\_\_\_\_

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

If yes, at what frequency? \_\_\_\_\_  
\_\_\_\_\_

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

\_\_\_\_\_ Yes      \_\_\_\_\_ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA

8. What is the volume of the restricted wastes disposed of to date?

\_\_\_\_\_  
\_\_\_\_\_

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      \_\_\_\_\_ NA